

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

JAMES C. HULCE, *individually and on  
behalf of a class of all persons and entities  
similarly situated,*

Plaintiff,

v.

ZIPONGO, INC. d/b/a FOODSMART,

Defendant.

Case No. 2:23-cv-00159-LA

**JOINT MOTION FOR ENTRY OF STIPULATED  
CONFIDENTIALITY/PROTECTIVE ORDER**

Defendant Zipongo, Inc. d/b/a Foodsmart and Plaintiff James C. Hulce jointly move the Court to enter the attached Stipulated Confidentiality/Protective Order.

Discovery in this matter may involve inquiry into confidential, proprietary, or private information that the parties agree is entitled to special protection from public disclosure and from use for any purpose other than prosecuting and defending this litigation. Good cause therefore exists to enter the attached Stipulated Confidentiality/Protective Order to protect information, documents, and tangible things produced by the parties during discovery.

Accordingly, the parties respectfully request that the Court enter the attached Stipulated Confidentiality/Protective Order.

DATED: May 19, 2023.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that today, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/Ryan D. Watstein

Ryan D. Watstein